

>>> "Douglas Mahone" <dmahone@h-m-g.com> 06/27/02 10:49AM >>>
Karl -

3. Time of Day Valuation: We understand the reasoning behind this proposed change, but are somewhat concerned about instability at the time of change from off-peak to on-peak and vice versa, resulting in loss of temperature control and/or increased demand charges.

So, because of the way this is done, I don't see how there could be instabilities or excessive demand charges. I hope this answers your concern. Thanks for raising it... I hadn't actually considered that possibility before.

Best wishes,
Doug.
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Comment from Karl Guttman
Via Email to Bill Pennington at the California Energy Commission

SUBJECT: Proposed changes to Title 24 Energy Standards

>>> Karl Guttman <kguttman@gb-eng.com> 05/29/02 10:20AM >>>

We would like you to consider the following comments in connection with some of the proposed changes:

1 Water cooled chillers over 200 TR should not be required for ice or chilled water storage systems or any systems where the chiller is operated primarily during off-peak hours (may require definition of "primarily"). There should also be exceptions allowed if water is in short supply (desert areas). Is this change meant to apply to plant capacity or unit capacity? E.g., if you have a 300 TR plant, can you use two air cooled 150 TR chillers?

2. Duct insulation at R-4 should be allowed if $t_o - t_i < 20$ degrees (or some such figure).

3. Time of Day Valuation: We understand the reasoning behind this proposed change, but are somewhat concerned about instability at the time of change from off-peak to on-peak and vice versa, resulting in loss of temperature control and/or increased demand charges.

4. Highly reflective roofs, if they represent very large areas (may need definition of "very large"), can represent a hazard to aviation because they could temporarily blind pilots.

> Karl Guttman

> Principal

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